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Attorneys for Plaintiff Taylor Thomson

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TAYLOR THOMSON,
Plaintiff,

v.

PERSISTENCE TECHNOLOGIES BVI
PTE LTD., TUSHAR AGGARWAL, and
ASHLEY RICHARDSON,
Defendants.

Case No. 2:23-cv-04669-MEMF-MAR

**DECLARATION OF TODD
HARRISON IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANT ASHLEY
RICHARDSON'S MOTION TO
COMPEL AND REQUEST FOR
SANCTIONS**

DECLARATION OF TODD HARRISON

I, Todd Harrison, declare as follows:

1. I am an attorney admitted pro hac vice to practice before this Court in the above-captioned matter. I am a partner with the law firm of McDermott Will & Schulte LLP, attorneys of record for Plaintiff Taylor Thomson in the above-captioned matter. I make this declaration in support of Ms. Thomson's Opposition to Defendant Ashley Richardson's Motion to Compel and Request for Sanctions.

2. Attached hereto as **Exhibit A**, is a true and correct copy of the Notice of Deposition of Taylor Thomson, dated September 6, 2024.

3. Attached hereto as **Exhibit B**, is a true and correct copy of Plaintiff Taylor Thomson's Notice of Deposition of Defendant Ashley Richardson, dated September 6, 2024.

4. Attached hereto as **Exhibit C**, is a true and correct copy of Plaintiff Taylor Thomson's First Set of Interrogatories to Defendant Ashley Richardson, dated September 12, 2024.

5. Attached hereto as **Exhibit D**, is a true and correct copy of Plaintiff Taylor Thomson's First Set of Requests for Production of Documents to Defendant Ashley Richardson, dated September 12, 2024.

6. Attached hereto as **Exhibit E**, is a true and correct copy of e-mails between Defendant Ashley Richardson and Plaintiff's counsel, dated September 6, 2024 to September 23, 2024.

7. Attached hereto as **Exhibit F**, is a true and correct copy of the Notice of Deposition of Taylor Thomson, dated January 17, 2025.

8. Attached hereto as **Exhibit G**, is a true and correct copy of e-mails between Defendant Ashley Richardson and Plaintiff's counsel, dated January 17, 2025 to February 25, 2025.

9. Attached hereto as **Exhibit H**, is a true and correct copy of text messages between Defendant Ashley Richardson and Plaintiff Taylor Thomson, dated October

1 13, 2024.

2 10. Attached hereto as **Exhibit I**, is a true and correct copy of the letter from
3 Todd Harrison to Ashley Richardson, dated July 11, 2025.
4

5 I declare under penalty of perjury under the laws of the United States of
6 America that the foregoing is true and correct.

7 Executed this 12th day of August, 2025, in New York, NY.
8

9 /s/Todd Harrison
10 Todd Harrison
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